

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

C. PEPPER LOGISTICS, LLC, et al.,)
)
Plaintiffs,)
) Case No.: 4:20-cv-01444
v.)
)
LANTER DELIVERY SYSTEMS, LLC, et)
al.,)
)
Defendants.)

**DECLARATION OF ANTON LOBOV PURSUANT TO
28 U.S.C. § 1746**

I, Anton Lobov, declare as follows under 28 U.S.C § 1746:

1. I am the age of majority, and I am competent to make this declaration.
2. I make this declaration based on my personal knowledge and observations.
3. I began working for Logistic Resources Solutions, Inc. (“LRS”) approximately two years ago as a Regional Transportation Manager located in Roanoke, Texas – not Missouri.
4. At all times while working for LRS, I lived and worked in Texas – not Missouri.
5. I performed my day to day job responsibilities for LRS in Roanoke, Texas – not Missouri.
6. I never traveled to Missouri to perform any LRS job duties, which consisted of managing the day to day operations for LRS regarding delivery and freight in the Texas region. In my day to day job functions, I did not interact with individuals in Missouri.
7. To the best of my recollection, the last time I visited Missouri was in December 2019, for a holiday work party. This social event was completely unrelated to the issues alleged in this lawsuit. Prior to that, I had not been to Missouri since approximately 2007, when I visited a college friend.
8. LRS was, and to my knowledge is, an Illinois corporation.
9. The last date I performed services for LRS was on or around August 21, 2020. My employment with LRS ended on August 22, 2020.

10. On August 22, 2020, I learned that Lanter Delivery Systems, LLC would no longer be doing business with C. Pepper Logistics, LLC or its affiliate companies, of which LRS is a part. I will refer to C. Pepper Logistics, LLC and its affiliate companies as the "C. Pepper Companies." Prior to being informed of this, I knew nothing about any of the C. Pepper Companies ceasing business operations.
11. I never communicated with Lanter Delivery Systems, LLC, White Line Systems, LLC, or Darien Brokerage, LLC employees or representatives to orchestrate of activities that would lead to any of the C. Pepper Companies ceasing business operations before August 22, 2020.
12. I had no role in the alleged conspiracy or plot described in the Petition of the above-captioned case.
13. I did not take any confidential or proprietary information from LRS or its affiliates upon my termination of employment with LRS.
14. I did not provide any confidential or proprietary information of LRS or its affiliates to any other business.
15. C. Pepper Companies' payroll, equipment, and route information was not confidential or proprietary. This information was routinely seen by Lanter Delivery Systems, LLC personnel.
16. With respect to payroll information at the conclusion of my employment:
 - a. I was in charge of payroll for the Texas region drivers working for C. Pepper Logistics, LLC affiliate(s). Their livelihood depended on me.
 - b. Payroll was due on Saturday, August 22, 2020.
 - c. I was told that the C. Pepper Logistics, LLC/Independent Service Providers, LLC were still responsible for payroll, but there had been threats that they were not going to pay.
 - d. As a result, and because I was fearful of my drivers not getting paid, I sent a record of the required payroll (for the Texas region drivers) to White Line Systems, LLC.
 - e. C. Pepper Logistics, LLC and/or affiliate(s) refused to pay the Texas region drivers for the week of August 17, 2020, through August 23, 2020.
17. I do not currently reside in Missouri and have never resided in Missouri.
18. I do not own, lease, or possess property – real or personal – that is located in Missouri.

19. I do not have a bank account in Missouri.
20. I have not availed myself to the state or Federal courts of Missouri.
21. I have never had any ownership interest in any business based in Missouri.
22. LRS failed to pay me wages for the work I performed from August 17, 2020, through August 23, 2020.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct to the best of my knowledge.

11/6/2020
Executed on _____

DocuSigned by:

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Anton Lobov